

# Exhibit 5

## Lollar, Tirzah

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**From:** Lollar, Tirzah  
**Sent:** Thursday, November 10, 2022 5:55 PM  
**To:** Andrew Stephens; zzz.External.dashby@omm.com; Raymond Winter  
**Cc:** Amy Hilton; Heather Hacker; Margolis, Craig D.; Odell, Christopher M.; zzz.External.lgodesky@omm.com; zzz.External.jchapa@omm.com; zzz.External.asantella@omm.com; Reeder-Ricchetti, Emily; Pieper, Megan; Martin, Meghan C.; Gerstner, Alyssa; zzz.External.rgalin@omm.com; Ramer, Paula; Diton, Matthew  
**Subject:** RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z  
**Attachments:** 2022.10.26 Plaintiffs' Notice of Deposition R. Exnicious.pdf  
**Categories:** Waiting on Response

Andrew:

We are willing to present Exnicious on your desired date of Nov 16, but will present her at A&P's offices in Houston per the parties' agreement on deposition locations. Please confirm that A&P Houston will work for Plaintiffs.

Thanks,  
Tirzah

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Tirzah Lollar  
Partner | [Bio](#)

**Arnold & Porter**

601 Massachusetts Ave., NW  
Washington, DC 20001-3743

T: +1 202.942.6199

[Tirzah.Lollar@arnoldporter.com](mailto:Tirzah.Lollar@arnoldporter.com)

[www.arnoldporter.com](http://www.arnoldporter.com) | [LinkedIn](#) | [Twitter](#)

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**From:** Andrew Stephens <andrew@hackerstephens.com>  
**Sent:** Thursday, October 27, 2022 4:51 PM  
**To:** Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>; zzz.External.dashby@omm.com <dashby@omm.com>; Raymond Winter <Raymond.Winter@oag.texas.gov>  
**Cc:** Amy Hilton <Amy.Hilton@oag.texas.gov>; Heather Hacker <heather@hackerstephens.com>; Margolis, Craig D. <Craig.Margolis@arnoldporter.com>; Odell, Christopher M. <Christopher.Odell@arnoldporter.com>; zzz.External.lgodesky@omm.com <lgodesky@omm.com>; zzz.External.jchapa@omm.com <jchapa@omm.com>; zzz.External.asantella@omm.com <asantella@omm.com>; Reeder-Ricchetti, Emily <Emily.Reeder-Ricchetti@arnoldporter.com>; Pieper, Megan <Megan.Pieper@arnoldporter.com>; Martin, Meghan C. <Meghan.Martin@arnoldporter.com>; Gerstner, Alyssa <Alyssa.Gerstner@arnoldporter.com>; zzz.External.rgalin@omm.com <rgalin@omm.com>; Ramer, Paula <Paula.Ramer@arnoldporter.com>  
**Subject:** RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

External E-mail

Relator deposition is December 2 and PPGT is December 6 so those dates won't work for Exnicious.

Nov 3: Hons (San Antonio), Kreager Mitchell, 7373 Broadway, San Antonio, TX 78209

Nov 10: Rossiter (DC), Arnold & Porter, 601 Massachusetts Ave., NW Washington, DC 20001

Nov 14: De Jong (Dallas), Office of the Attorney General, 1412 Main Street, Dallas, TX 75202

Nov 15: Trivisonno (Naples FL), 4851 Tamiami Trail North Park Shore, Suite 200, Naples, FL 34103

Nov 16: Exnicious (Houston), Office of the Attorney General, 808 Travis Street, Suite 1520, Houston, TX 77022

Nov 17-18: PPST/PPCC/PPSA (San Antonio) Kreager Mitchell, 7373 Broadway, San Antonio, TX 78209

Nov 21: Lambrecht (Austin), O'Melveny & Meyers, 303 Colorado Street, Suite 2750, Austin, TX 78701

Nov 22: Sokolow (Austin), O'Melveny & Meyers, 303 Colorado Street, Suite 2750, Austin, TX 78701

Nov 22: Linton (Houston), Office of the Attorney General, 808 Travis Street, Suite 1520, Houston, TX 77022

Nov 28: PPFA Custer (DC), O'Melveny & Meyers, 1625 Eye Street, NW Washington, DC 20006

Nov 29: PPFA Barrow-Klein (DC), O'Melveny & Meyers, 1625 Eye Street, NW Washington, DC 20006

Nov 30: Barrow-Klein (DC), O'Melveny & Meyers, 1625 Eye Street, NW Washington, DC 20006

Dec 1: PPGC (Houston), Arnold & Porter, 700 Louisiana Street, Suite 4000, Houston, TX 77002

Dec 2: Relator (Houston), Arnold & Porter, 700 Louisiana Street, Suite 4000, Houston, TX 77002

Dec 5: TX/HHSC 30(b)(6) (Austin), Office of the Attorney General, 300 West 15<sup>th</sup> Street, Austin, TX 78701

Dec 6: PPGT (Austin), O'Melveny & Meyers, 303 Colorado Street, Suite 2750, Austin, TX 78701

Dec 7: Dudney (Chicago), 8770 West Bryn Mayr Avenue, Suite 1300, Chicago, IL 60631

Dec 8: Kramer (Chicago), 8770 West Bryn Mayr Avenue, Suite 1300, Chicago, IL 60631

Dec 8: Lochabay (Dallas), 2100 Ross Avenue, 21st Floor, Dallas, TX 75201

Dec 9: Collucio (New York), 7 Times Square Tower, New York, NY 10036

Pending dates/locations from PPFA: Stewart, Collucio

Pending dates/locations from PP Affiliates: Linton

Pending dates/locations from TX: TX/HHSC 30(b)(6)

Pending dates/locations from 3rd parties: Maxwell, Spears, De Jong, Exnicious

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**From:** Lollar, Tirzah <[Tirzah.Lollar@arnoldporter.com](mailto:Tirzah.Lollar@arnoldporter.com)>

**Sent:** Thursday, October 27, 2022 12:01 PM

**To:** Andrew Stephens <[andrew@hackerstephens.com](mailto:andrew@hackerstephens.com)>; [dashby@omm.com](mailto:dashby@omm.com); Raymond Winter <[Raymond.Winter@oag.texas.gov](mailto:Raymond.Winter@oag.texas.gov)>

**Cc:** Amy Hilton <[Amy.Hilton@oag.texas.gov](mailto:Amy.Hilton@oag.texas.gov)>; Heather Hacker <[heather@hackerstephens.com](mailto:heather@hackerstephens.com)>; Margolis, Craig D. <[Craig.Margolis@arnoldporter.com](mailto:Craig.Margolis@arnoldporter.com)>; Odell, Christopher M. <[Christopher.Odell@arnoldporter.com](mailto:Christopher.Odell@arnoldporter.com)>; [lgodesky@omm.com](mailto:lgodesky@omm.com); [jchapa@omm.com](mailto:jchapa@omm.com); [asantella@omm.com](mailto:asantella@omm.com); Reeder-Ricchetti, Emily <[Emily.Reeder-Ricchetti@arnoldporter.com](mailto:Emily.Reeder-Ricchetti@arnoldporter.com)>; Pieper, Megan <[Megan.Pieper@arnoldporter.com](mailto:Megan.Pieper@arnoldporter.com)>; Martin, Meghan C. <[Meghan.Martin@arnoldporter.com](mailto:Meghan.Martin@arnoldporter.com)>; Gerstner, Alyssa <[Alyssa.Gerstner@arnoldporter.com](mailto:Alyssa.Gerstner@arnoldporter.com)>; [rgalin@omm.com](mailto:rgalin@omm.com); Ramer, Paula <[Paula.Ramer@arnoldporter.com](mailto:Paula.Ramer@arnoldporter.com)>

**Subject:** RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

Andrew:

Thanks for pulling back the subpoena. Exnicious can be deposed on Dec 2 or 6 in Houston. Can you make either of those work?

Thanks,  
Tirzah

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Tirzah Lollar  
Partner | [Bio](#)

**Arnold & Porter**

601 Massachusetts Ave., NW  
Washington, DC 20001-3743  
T: +1 202.942.6199

[Tirzah.Lollar@arnoldporter.com](mailto:Tirzah.Lollar@arnoldporter.com)

[www.arnoldporter.com](http://www.arnoldporter.com) | [LinkedIn](#) | [Twitter](#)

**From:** Andrew Stephens <[andrew@hackerstephens.com](mailto:andrew@hackerstephens.com)>

**Sent:** Wednesday, October 26, 2022 4:39 PM

**To:** Lollar, Tirzah <[Tirzah.Lollar@arnoldporter.com](mailto:Tirzah.Lollar@arnoldporter.com)>; [zzz.External.dashby@omm.com](mailto:zzz.External.dashby@omm.com) <[dashby@omm.com](mailto:dashby@omm.com)>; Raymond Winter <[Raymond.Winter@oag.texas.gov](mailto:Raymond.Winter@oag.texas.gov)>

**Cc:** Amy Hilton <[Amy.Hilton@oag.texas.gov](mailto:Amy.Hilton@oag.texas.gov)>; Heather Hacker <[heather@hackerstephens.com](mailto:heather@hackerstephens.com)>; Margolis, Craig D. <[Craig.Margolis@arnoldporter.com](mailto:Craig.Margolis@arnoldporter.com)>; Odell, Christopher M. <[Christopher.Odell@arnoldporter.com](mailto:Christopher.Odell@arnoldporter.com)>; [zzz.External.lgodesky@omm.com](mailto:zzz.External.lgodesky@omm.com) <[lgodesky@omm.com](mailto:lgodesky@omm.com)>; [zzz.External.jchapa@omm.com](mailto:zzz.External.jchapa@omm.com) <[jchapa@omm.com](mailto:jchapa@omm.com)>; [zzz.External.asantella@omm.com](mailto:zzz.External.asantella@omm.com) <[asantella@omm.com](mailto:asantella@omm.com)>; Reeder-Ricchetti, Emily <[Emily.Reeder-Ricchetti@arnoldporter.com](mailto:Emily.Reeder-Ricchetti@arnoldporter.com)>; Pieper, Megan <[Megan.Pieper@arnoldporter.com](mailto:Megan.Pieper@arnoldporter.com)>; Martin, Meghan C. <[Meghan.Martin@arnoldporter.com](mailto:Meghan.Martin@arnoldporter.com)>; Gerstner, Alyssa <[Alyssa.Gerstner@arnoldporter.com](mailto:Alyssa.Gerstner@arnoldporter.com)>; [zzz.External.rgalin@omm.com](mailto:zzz.External.rgalin@omm.com) <[rgalin@omm.com](mailto:rgalin@omm.com)>; Ramer, Paula <[Paula.Ramer@arnoldporter.com](mailto:Paula.Ramer@arnoldporter.com)>

**Subject:** RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

External E-mail

Tirzah, attached is a depo notice instead of subpoena.

Andrew

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**From:** Andrew Stephens

**Sent:** Wednesday, October 26, 2022 3:32 PM

**To:** Lollar, Tirzah <[Tirzah.Lollar@arnoldporter.com](mailto:Tirzah.Lollar@arnoldporter.com)>; [dashby@omm.com](mailto:dashby@omm.com); Raymond Winter <[Raymond.Winter@oag.texas.gov](mailto:Raymond.Winter@oag.texas.gov)>

**Cc:** Amy Hilton <[Amy.Hilton@oag.texas.gov](mailto:Amy.Hilton@oag.texas.gov)>; Heather Hacker <[heather@hackerstephens.com](mailto:heather@hackerstephens.com)>; Margolis, Craig D. <[Craig.Margolis@arnoldporter.com](mailto:Craig.Margolis@arnoldporter.com)>; Odell, Christopher M. <[Christopher.Odell@arnoldporter.com](mailto:Christopher.Odell@arnoldporter.com)>; [lgodesky@omm.com](mailto:lgodesky@omm.com); [jchapa@omm.com](mailto:jchapa@omm.com); [asantella@omm.com](mailto:asantella@omm.com); Reeder-Ricchetti, Emily <[Emily.Reeder-Ricchetti@arnoldporter.com](mailto:Emily.Reeder-Ricchetti@arnoldporter.com)>; Pieper, Megan <[Megan.Pieper@arnoldporter.com](mailto:Megan.Pieper@arnoldporter.com)>; Martin, Meghan C. <[Meghan.Martin@arnoldporter.com](mailto:Meghan.Martin@arnoldporter.com)>; Gerstner, Alyssa <[Alyssa.Gerstner@arnoldporter.com](mailto:Alyssa.Gerstner@arnoldporter.com)>; [rgalin@omm.com](mailto:rgalin@omm.com); Ramer, Paula <[Paula.Ramer@arnoldporter.com](mailto:Paula.Ramer@arnoldporter.com)>

**Subject:** RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

Thanks, Tirzah. No problem re withdrawing the subpoena.

Andrew

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**From:** Lollar, Tirzah <[Tirzah.Lollar@arnoldporter.com](mailto:Tirzah.Lollar@arnoldporter.com)>

**Sent:** Wednesday, October 26, 2022 3:24 PM

**To:** Andrew Stephens <[andrew@hackerstephens.com](mailto:andrew@hackerstephens.com)>; [dashby@omm.com](mailto:dashby@omm.com); Raymond Winter <[Raymond.Winter@oag.texas.gov](mailto:Raymond.Winter@oag.texas.gov)>

**Cc:** Amy Hilton <[Amy.Hilton@oag.texas.gov](mailto:Amy.Hilton@oag.texas.gov)>; Heather Hacker <[heather@hackerstephens.com](mailto:heather@hackerstephens.com)>; Margolis, Craig D. <[Craig.Margolis@arnoldporter.com](mailto:Craig.Margolis@arnoldporter.com)>; Odell, Christopher M. <[Christopher.Odell@arnoldporter.com](mailto:Christopher.Odell@arnoldporter.com)>; [lgodesky@omm.com](mailto:lgodesky@omm.com); [jchapa@omm.com](mailto:jchapa@omm.com); [asantella@omm.com](mailto:asantella@omm.com); Reeder-Ricchetti, Emily <[Emily.Reeder-Ricchetti@arnoldporter.com](mailto:Emily.Reeder-Ricchetti@arnoldporter.com)>; Pieper, Megan <[Megan.Pieper@arnoldporter.com](mailto:Megan.Pieper@arnoldporter.com)>; Martin, Meghan C. <[Meghan.Martin@arnoldporter.com](mailto:Meghan.Martin@arnoldporter.com)>; Gerstner, Alyssa <[Alyssa.Gerstner@arnoldporter.com](mailto:Alyssa.Gerstner@arnoldporter.com)>; [rgalin@omm.com](mailto:rgalin@omm.com); Ramer, Paula <[Paula.Ramer@arnoldporter.com](mailto:Paula.Ramer@arnoldporter.com)>

**Subject:** Re: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

Thanks, Andrew. That works. We will send a notice for Relator's depo and for Lochabay on the date Ray proposed.

We were disappointed to learn that Relator may be trying to serve a subpoena on Ronda Exnicious. She is a current employee of PPGC and a subpoena is not necessary or appropriate. We only learned on Monday that Relator would like to depose her and are working hard to propose a date or two as quickly as possible. I should be able to do that if not later today, then tomorrow. We would appreciate you withdrawing any subpoena and instructing the process server to halt efforts to serve her.

Thanks,  
Tirzah

---

**From:** Andrew Stephens <[andrew@hackerstephens.com](mailto:andrew@hackerstephens.com)>  
**Sent:** Wednesday, October 26, 2022 3:14 PM  
**To:** Lollar, Tirzah; [zzz.External.dashby@omm.com](mailto:zzz.External.dashby@omm.com); Raymond Winter  
**Cc:** Amy Hilton; Heather Hacker; Margolis, Craig D.; Odell, Christopher M.; [zzz.External.lgodesky@omm.com](mailto:zzz.External.lgodesky@omm.com); [zzz.External.jchapa@omm.com](mailto:zzz.External.jchapa@omm.com); [zzz.External.asantella@omm.com](mailto:zzz.External.asantella@omm.com); Reeder-Ricchetti, Emily; Pieper, Megan; Martin, Meghan C.; Gerstner, Alyssa; [zzz.External.rgalin@omm.com](mailto:zzz.External.rgalin@omm.com)  
**Subject:** RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

External E-mail

Tirzah,

Relator is available in Houston on December 2 at Arnold & Porter office.

Andrew

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**From:** Andrew Stephens  
**Sent:** Tuesday, October 25, 2022 4:14 PM  
**To:** Lollar, Tirzah <[Tirzah.Lollar@arnoldporter.com](mailto:Tirzah.Lollar@arnoldporter.com)>; [dashby@omm.com](mailto:dashby@omm.com); Raymond Winter <[Raymond.Winter@oag.texas.gov](mailto:Raymond.Winter@oag.texas.gov)>  
**Cc:** Amy Hilton <[Amy.Hilton@oag.texas.gov](mailto:Amy.Hilton@oag.texas.gov)>; Heather Hacker <[heather@hackerstephens.com](mailto:heather@hackerstephens.com)>; Margolis, Craig D. <[Craig.Margolis@arnoldporter.com](mailto:Craig.Margolis@arnoldporter.com)>; Odell, Christopher M. <[Christopher.Odell@arnoldporter.com](mailto:Christopher.Odell@arnoldporter.com)>; [lgodesky@omm.com](mailto:lgodesky@omm.com); [jchapa@omm.com](mailto:jchapa@omm.com); [asantella@omm.com](mailto:asantella@omm.com); Reeder-Ricchetti, Emily <[Emily.Reeder-Ricchetti@arnoldporter.com](mailto:Emily.Reeder-Ricchetti@arnoldporter.com)>; Pieper, Megan <[Megan.Pieper@arnoldporter.com](mailto:Megan.Pieper@arnoldporter.com)>; Martin, Meghan C. <[Meghan.Martin@arnoldporter.com](mailto:Meghan.Martin@arnoldporter.com)>; Gerstner, Alyssa <[Alyssa.Gerstner@arnoldporter.com](mailto:Alyssa.Gerstner@arnoldporter.com)>; [rgalin@omm.com](mailto:rgalin@omm.com)  
**Subject:** RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

Tirzah, Danny,

Please see attached amended deposition notices for the Planned Parenthood witnesses and a notice of subpoenas for Marianne De Jong and Ronda Exnicious. The amended notices and subpoenas should reflect the agreed dates and locations listed below, with open issues highlighted and noted at end.

Relator is available on December 2 and we should have a location to you tonight or first thing tomorrow morning. Per Ray's email, Lochabay is available on December 8 in Dallas at the address listed below. I penciled in TX/HHSC 30(b)(6) on December 5 since that is one of the few remaining open dates, but Texas will need to confirm that date. Tirzah, we also need to discuss Linton.

Andrew

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Nov 3: Hons (San Antonio), Kreager Mitchell, 7373 Broadway, San Antonio, TX 78209  
Nov 10: Rossiter (DC), Arnold & Porter, 601 Massachusetts Ave., NW Washington, DC 20001  
Nov 14: De Jong (Dallas), Office of the Attorney General, 1412 Main Street, Dallas, TX 75202  
Nov 15: Trivisonno (Naples FL), 4851 Tamiami Trail North Park Shore, Suite 200, Naples, FL 34103  
Nov 16: Exnicious (Houston), Office of the Attorney General, 808 Travis Street, Suite 1520, Houston, TX 77022  
Nov 17-18: PPST/PPCC/PPSA (San Antonio) Kreager Mitchell, 7373 Broadway, San Antonio, TX 78209  
Nov 21: Lambrecht (Austin), O'Melveny & Meyers, 303 Colorado Street, Suite 2750, Austin, TX 78701  
Nov 22: Sokolow (Austin), O'Melveny & Meyers, 303 Colorado Street, Suite 2750, Austin, TX 78701  
Nov 22: Linton (Houston), Office of the Attorney General, 808 Travis Street, Suite 1520, Houston, TX 77022  
Nov 28: PPFA Custer (DC), O'Melveny & Meyers, 1625 Eye Street, NW Washington, DC 20006  
Nov 29: PPFA Barrow-Klein (DC), O'Melveny & Meyers, 1625 Eye Street, NW Washington, DC 20006  
Nov 30: Barrow-Klein (DC), O'Melveny & Meyers, 1625 Eye Street, NW Washington, DC 20006  
Dec 1: PPGC (Houston), Arnold & Porter, 700 Louisiana Street, Suite 4000, Houston, TX 77002  
Dec 2: Relator (Houston), Arnold & Porter, 700 Louisiana Street, Suite 4000, Houston, TX 77002  
Dec 5: TX/HHSC 30(b)(6) (Austin), Office of the Attorney General, 300 West 15<sup>th</sup> Street, Austin, TX 78701  
Dec 6: PPGT (Austin), O'Melveny & Meyers, 303 Colorado Street, Suite 2750, Austin, TX 78701  
Dec 7: Dudley (Chicago), 8770 West Bryn Mayr Avenue, Suite 1300, Chicago, IL 60631  
Dec 8: Kramer (Chicago), 8770 West Bryn Mayr Avenue, Suite 1300, Chicago, IL 60631  
Dec 8: Lochabay (Dallas), 2100 Ross Avenue, 21st Floor, Dallas, TX 75201  
Dec 9: Collucio (New York), 7 Times Square Tower, New York, NY 10036

Pending dates/locations from PPFA: Stewart, Collucio

Pending dates/locations from PP Affiliates: Linton

Pending dates/locations from TX: TX/HHSC 30(b)(6)

Pending dates/locations from 3rd parties: Maxwell, Spears, De Jong, Exnicious

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**From:** Lollar, Tirzah <[Tirzah.Lollar@arnoldporter.com](mailto:Tirzah.Lollar@arnoldporter.com)>

**Sent:** Monday, October 24, 2022 7:25 PM

**To:** Andrew Stephens <[andrew@hackerstephens.com](mailto:andrew@hackerstephens.com)>; [dashby@omm.com](mailto:dashby@omm.com); Raymond Winter <[Raymond.Winter@oag.texas.gov](mailto:Raymond.Winter@oag.texas.gov)>

**Cc:** Amy Hilton <[Amy.Hilton@oag.texas.gov](mailto:Amy.Hilton@oag.texas.gov)>; Heather Hacker <[heather@hackerstephens.com](mailto:heather@hackerstephens.com)>; Margolis, Craig D. <[Craig.Margolis@arnoldporter.com](mailto:Craig.Margolis@arnoldporter.com)>; Odell, Christopher M. <[Christopher.Odell@arnoldporter.com](mailto:Christopher.Odell@arnoldporter.com)>; [lgodesky@omm.com](mailto:lgodesky@omm.com); [jchapa@omm.com](mailto:jchapa@omm.com); [asantella@omm.com](mailto:asantella@omm.com); Reeder-Ricchetti, Emily <[Emily.Reeder-Ricchetti@arnoldporter.com](mailto:Emily.Reeder-Ricchetti@arnoldporter.com)>; Pieper, Megan <[Megan.Pieper@arnoldporter.com](mailto:Megan.Pieper@arnoldporter.com)>; Martin, Meghan C. <[Meghan.Martin@arnoldporter.com](mailto:Meghan.Martin@arnoldporter.com)>; Gerstner, Alyssa <[Alyssa.Gerstner@arnoldporter.com](mailto:Alyssa.Gerstner@arnoldporter.com)>; [rgalin@omm.com](mailto:rgalin@omm.com)

**Subject:** RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

Andrew and Heather:

Following up on our call from earlier today, we wanted to confirm that you agreed that the 30b6 for PPST/PPSA/PPCC will take place on Nov 17 with Nov 18 as a spill over date if needed.

I'm not authorized at this point to accept service for Marianne DeJong.

See below for deposition locations. Note that we are still confirming that Kreager Mitchell has sufficient available conference room space. We know you want to issue new notices and would agree that if we have to change the location from Kreager Mitchell for the 2 depositions in San Antonio, you would not need to re-notice.

Nov 3: Hons (San Antonio), Kreager Mitchell, 7373 Broadway, San Antonio, TX 78209  
Nov 10: Rossiter (DC) AP DC, 601 Massachusetts Ave., NW Washington, DC 20001  
Nov 17: PPST/CC/SA (San Antonio) Kreager Mitchell, 7373 Broadway, San Antonio, TX 78209  
Nov 21: Lambrecht (Austin), 303 Colorado Street, Suite 2750, Austin, TX 78701  
Nov 22: Sokolow (Austin), 303 Colorado Street, Suite 2750, Austin, TX 78701  
Dec 1: PPGC (Houston) AP Houston, 700 Louisiana Street, Suite 4000, Houston, TX 77002  
Dec 6: PPGT (Austin), 303 Colorado Street, Suite 2750, Austin, TX 78701

Unfortunately, we have been unable to come up with an alternative date for Linton beyond the ones we previously offered. We would reiterate our offer to double track if you can take her deposition on December 8 in Houston. She is also available Dec 9, 10, or 16 in Houston. If you are willing to take her deposition remotely, Dec 5 may still be an option. Please let us know if you would be able to make any of these options work.

As discussed, please let us know Relator's availability Dec 1-9 for Relator's deposition and the location.

Finally, Defendants would like to depose Lochabay on Nov 29-Dec 2 or Dec 8-9. We assume the deposition will be in Austin per Ray's note from some time ago, but please let us know.

Thanks,  
Tirzah

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Tirzah Lollar  
Partner | [Bio](#)

**Arnold & Porter**

601 Massachusetts Ave., NW  
Washington, DC 20001-3743  
T: +1 202.942.6199

[Tirzah.Lollar@arnoldporter.com](mailto:Tirzah.Lollar@arnoldporter.com)

[www.arnoldporter.com](http://www.arnoldporter.com) | [LinkedIn](#) | [Twitter](#)

---

**From:** Andrew Stephens <[andrew@hackerstephens.com](mailto:andrew@hackerstephens.com)>

**Sent:** Monday, October 24, 2022 5:35 PM

**To:** [zzz.External.dashby@omm.com](mailto:zzz.External.dashby@omm.com) <[dashby@omm.com](mailto:zzz.External.dashby@omm.com)>; Lollar, Tirzah <[Tirzah.Lollar@arnoldporter.com](mailto:Tirzah.Lollar@arnoldporter.com)>; Raymond Winter <[Raymond.Winter@oag.texas.gov](mailto:Raymond.Winter@oag.texas.gov)>

**Cc:** Amy Hilton <[Amy.Hilton@oag.texas.gov](mailto:Amy.Hilton@oag.texas.gov)>; Heather Hacker <[heather@hackerstephens.com](mailto:heather@hackerstephens.com)>; Margolis, Craig D. <[Craig.Margolis@arnoldporter.com](mailto:Craig.Margolis@arnoldporter.com)>; Odell, Christopher M. <[Christopher.Odell@arnoldporter.com](mailto:Christopher.Odell@arnoldporter.com)>; [zzz.External.lgodesky@omm.com](mailto:zzz.External.lgodesky@omm.com) <[lgodesky@omm.com](mailto:lgodesky@omm.com)>; [zzz.External.jchapa@omm.com](mailto:zzz.External.jchapa@omm.com) <[jchapa@omm.com](mailto:jchapa@omm.com)>; [zzz.External.asantella@omm.com](mailto:zzz.External.asantella@omm.com) <[asantella@omm.com](mailto:asantella@omm.com)>; Reeder-Ricchetti, Emily <[Emily.Reeder-Ricchetti@arnoldporter.com](mailto:Emily.Reeder-Ricchetti@arnoldporter.com)>; Pieper, Megan <[Megan.Pieper@arnoldporter.com](mailto:Megan.Pieper@arnoldporter.com)>; Martin, Meghan C. <[Meghan.Martin@arnoldporter.com](mailto:Meghan.Martin@arnoldporter.com)>; Gerstner, Alyssa <[Alyssa.Gerstner@arnoldporter.com](mailto:Alyssa.Gerstner@arnoldporter.com)>; [zzz.External.rgalin@omm.com](mailto:zzz.External.rgalin@omm.com) <[rgalin@omm.com](mailto:rgalin@omm.com)>

**Subject:** RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

External E-mail

Thank you, Danny.

Andrew



**From:** Ashby, Danny S. <[dashby@omm.com](mailto:dashby@omm.com)>

**Sent:** Monday, October 24, 2022 3:20 PM

**To:** Andrew Stephens <[andrew@hackerstephens.com](mailto:andrew@hackerstephens.com)>; Lollar, Tirzah <[Tirzah.Lollar@arnoldporter.com](mailto:Tirzah.Lollar@arnoldporter.com)>; Raymond Winter <[Raymond.Winter@oag.texas.gov](mailto:Raymond.Winter@oag.texas.gov)>

**Cc:** Amy Hilton <[Amy.Hilton@oag.texas.gov](mailto:Amy.Hilton@oag.texas.gov)>; Heather Hacker <[heather@hackerstephens.com](mailto:heather@hackerstephens.com)>; Margolis, Craig D. <[Craig.Margolis@arnoldporter.com](mailto:Craig.Margolis@arnoldporter.com)>; Odell, Christopher M. <[Christopher.Odell@arnoldporter.com](mailto:Christopher.Odell@arnoldporter.com)>; Godesky, Leah <[lgodesky@omm.com](mailto:lgodesky@omm.com)>; Chapa, Justin R. <[jchapa@omm.com](mailto:jchapa@omm.com)>; Santella, Amanda M. <[asantella@omm.com](mailto:asantella@omm.com)>; Reeder-Ricchetti, Emily <[Emily.Reeder-Ricchetti@arnoldporter.com](mailto:Emily.Reeder-Ricchetti@arnoldporter.com)>; Pieper, Megan <[Megan.Pieper@arnoldporter.com](mailto:Megan.Pieper@arnoldporter.com)>; Martin, Meghan C. <[Meghan.Martin@arnoldporter.com](mailto:Meghan.Martin@arnoldporter.com)>; Gerstner, Alyssa <[Alyssa.Gerstner@arnoldporter.com](mailto:Alyssa.Gerstner@arnoldporter.com)>; Galin, Ross B. <[rgalin@omm.com](mailto:rgalin@omm.com)>

**Subject:** RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

Hi Andrew and Heather -

Following up on our call earlier today, we're still working on dates for Emily Stewart and Rosemary Collucio. For Rosemary, you asked us to look at December 9 in NY and we will do that.

Separately, I was mistaken about the location of Kim Custer's 30(b)(6) deposition. We will present her in DC on the 28th, which should be easier for everyone given that Vickie Barrow-Klein is also scheduled in DC on the 29<sup>th</sup> and 30<sup>th</sup>. And both of these depositions will be in our DC office. Thanks.

Danny

Danny S. Ashby  
O: +1-972-360-1904  
M: +1-214-577-9886  
[dasbhy@omm.com](mailto:dasbhy@omm.com)

---

**From:** Andrew Stephens <[andrew@hackerstephens.com](mailto:andrew@hackerstephens.com)>

**Sent:** Thursday, October 20, 2022 11:25 AM

**To:** Ashby, Danny S. <[dashby@omm.com](mailto:dashby@omm.com)>; Lollar, Tirzah <[Tirzah.Lollar@arnoldporter.com](mailto:Tirzah.Lollar@arnoldporter.com)>; Raymond Winter <[Raymond.Winter@oag.texas.gov](mailto:Raymond.Winter@oag.texas.gov)>

**Cc:** Amy Hilton <[Amy.Hilton@oag.texas.gov](mailto:Amy.Hilton@oag.texas.gov)>; Heather Hacker <[heather@hackerstephens.com](mailto:heather@hackerstephens.com)>; Margolis, Craig D. <[Craig.Margolis@arnoldporter.com](mailto:Craig.Margolis@arnoldporter.com)>; Odell, Christopher M. <[Christopher.Odell@arnoldporter.com](mailto:Christopher.Odell@arnoldporter.com)>; Godesky, Leah <[lgodesky@omm.com](mailto:lgodesky@omm.com)>; Chapa, Justin R. <[jchapa@omm.com](mailto:jchapa@omm.com)>; Santella, Amanda M. <[asantella@omm.com](mailto:asantella@omm.com)>; Reeder-Ricchetti, Emily <[Emily.Reeder-Ricchetti@arnoldporter.com](mailto:Emily.Reeder-Ricchetti@arnoldporter.com)>; Pieper, Megan <[Megan.Pieper@arnoldporter.com](mailto:Megan.Pieper@arnoldporter.com)>; Martin, Meghan C. <[Meghan.Martin@arnoldporter.com](mailto:Meghan.Martin@arnoldporter.com)>; Gerstner, Alyssa <[Alyssa.Gerstner@arnoldporter.com](mailto:Alyssa.Gerstner@arnoldporter.com)>; Galin, Ross B. <[rgalin@omm.com](mailto:rgalin@omm.com)>

**Subject:** RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

[EXTERNAL MESSAGE]

Danny, Tirzah,

Please let us know if this schedule will work for Defendants:



Nov 3: Hons (Austin/SA)  
Nov 10: Rossiter (DC)  
Nov 15: Trivisonno (FL)  
Nov 17: PPST/CC/SA (Austin/SA)  
Nov 21: Lambrecht (Austin)  
Nov 22: Sokolow (Austin)  
Nov 28: PPFA Custer (NY)  
Nov 29: PPFA Barrow-Klein (DC)  
Nov 30: Barrow-Klein (DC)  
Dec 1: PPGC (Houston)  
Dec 5: Linton (Houston)  
Dec 6: PPGT (Austin/Dallas)  
Dec 7: Dudney (Chicago)  
Dec 8: Kramer (Chicago)

Andrew

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**From:** Ashby, Danny S. <[dashby@omm.com](mailto:dashby@omm.com)>  
**Sent:** Wednesday, October 19, 2022 7:26 PM  
**To:** Andrew Stephens <[andrew@hackerstephens.com](mailto:andrew@hackerstephens.com)>; Lollar, Tirzah <[Tirzah.Lollar@arnoldporter.com](mailto:Tirzah.Lollar@arnoldporter.com)>; Raymond Winter <[Raymond.Winter@oag.texas.gov](mailto:Raymond.Winter@oag.texas.gov)>  
**Cc:** Amy Hilton <[Amy.Hilton@oag.texas.gov](mailto:Amy.Hilton@oag.texas.gov)>; Heather Hacker <[heather@hackerstephens.com](mailto:heather@hackerstephens.com)>; Margolis, Craig D. <[Craig.Margolis@arnoldporter.com](mailto:Craig.Margolis@arnoldporter.com)>; Odell, Christopher M. <[Christopher.Odell@arnoldporter.com](mailto:Christopher.Odell@arnoldporter.com)>; Godesky, Leah <[lgodesky@omm.com](mailto:lgodesky@omm.com)>; Chapa, Justin R. <[jchapa@omm.com](mailto:jchapa@omm.com)>; Santella, Amanda M. <[asantella@omm.com](mailto:asantella@omm.com)>; Reeder-Ricchetti, Emily <[Emily.Reeder-Ricchetti@arnoldporter.com](mailto:Emily.Reeder-Ricchetti@arnoldporter.com)>; Pieper, Megan <[Megan.Pieper@arnoldporter.com](mailto:Megan.Pieper@arnoldporter.com)>; Martin, Meghan C. <[Meghan.Martin@arnoldporter.com](mailto:Meghan.Martin@arnoldporter.com)>; Gerstner, Alyssa <[Alyssa.Gerstner@arnoldporter.com](mailto:Alyssa.Gerstner@arnoldporter.com)>; Galin, Ross B. <[rgalin@omm.com](mailto:rgalin@omm.com)>  
**Subject:** RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

Hi Andrew -

Yes, Vickie would be in DC and Kim would be in NYC (or possibly Philadelphia if you'd prefer). Separately, we represent Emily Stewart and will work on dates for her -- and we will circle back soon on Rosemary Coluccio. Thanks.

Danny

Danny S. Ashby  
O: +1-972-360-1904  
M: +1-214-577-9886  
[dasbhy@omm.com](mailto:dasbhy@omm.com)

---

**From:** Andrew Stephens <[andrew@hackerstephens.com](mailto:andrew@hackerstephens.com)>  
**Sent:** Wednesday, October 19, 2022 5:55 PM  
**To:** Ashby, Danny S. <[dashby@omm.com](mailto:dashby@omm.com)>; Lollar, Tirzah <[Tirzah.Lollar@arnoldporter.com](mailto:Tirzah.Lollar@arnoldporter.com)>; Raymond Winter <[Raymond.Winter@oag.texas.gov](mailto:Raymond.Winter@oag.texas.gov)>  
**Cc:** Amy Hilton <[Amy.Hilton@oag.texas.gov](mailto:Amy.Hilton@oag.texas.gov)>; Heather Hacker <[heather@hackerstephens.com](mailto:heather@hackerstephens.com)>; Margolis, Craig D. <[Craig.Margolis@arnoldporter.com](mailto:Craig.Margolis@arnoldporter.com)>; Odell, Christopher M. <[Christopher.Odell@arnoldporter.com](mailto:Christopher.Odell@arnoldporter.com)>; Godesky, Leah

<[lgodesky@omm.com](mailto:lgodesky@omm.com)>; Chapa, Justin R. <[jchapa@omm.com](mailto:jchapa@omm.com)>; Santella, Amanda M. <[asantella@omm.com](mailto:asantella@omm.com)>; Reeder-Ricchetti, Emily <[Emily.Reeder-Ricchetti@arnoldporter.com](mailto:Emily.Reeder-Ricchetti@arnoldporter.com)>; Pieper, Megan <[Megan.Pieper@arnoldporter.com](mailto:Megan.Pieper@arnoldporter.com)>; Martin, Meghan C. <[Meghan.Martin@arnoldporter.com](mailto:Meghan.Martin@arnoldporter.com)>; Gerstner, Alyssa <[Alyssa.Gerstner@arnoldporter.com](mailto:Alyssa.Gerstner@arnoldporter.com)>; Galin, Ross B. <[rgalin@omm.com](mailto:rgalin@omm.com)>

**Subject:** [SUSPICIOUS MESSAGE] RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

Thanks, Danny. Do you have proposed locations for Kim Custer and Vickie Barrow-Klein?

Andrew

---

**From:** Ashby, Danny S. <[dashby@omm.com](mailto:dashby@omm.com)>

**Sent:** Wednesday, October 19, 2022 5:18 PM

**To:** Andrew Stephens <[andrew@hackerstephens.com](mailto:andrew@hackerstephens.com)>; Lollar, Tirzah <[Tirzah.Lollar@arnoldporter.com](mailto:Tirzah.Lollar@arnoldporter.com)>; Raymond Winter <[Raymond.Winter@oag.texas.gov](mailto:Raymond.Winter@oag.texas.gov)>

**Cc:** Amy Hilton <[Amy.Hilton@oag.texas.gov](mailto:Amy.Hilton@oag.texas.gov)>; Heather Hacker <[heather@hackerstephens.com](mailto:heather@hackerstephens.com)>; Margolis, Craig D. <[Craig.Margolis@arnoldporter.com](mailto:Craig.Margolis@arnoldporter.com)>; Odell, Christopher M. <[Christopher.Odell@arnoldporter.com](mailto:Christopher.Odell@arnoldporter.com)>; Godesky, Leah <[lgodesky@omm.com](mailto:lgodesky@omm.com)>; Chapa, Justin R. <[jchapa@omm.com](mailto:jchapa@omm.com)>; Santella, Amanda M. <[asantella@omm.com](mailto:asantella@omm.com)>; Reeder-Ricchetti, Emily <[Emily.Reeder-Ricchetti@arnoldporter.com](mailto:Emily.Reeder-Ricchetti@arnoldporter.com)>; Pieper, Megan <[Megan.Pieper@arnoldporter.com](mailto:Megan.Pieper@arnoldporter.com)>; Martin, Meghan C. <[Meghan.Martin@arnoldporter.com](mailto:Meghan.Martin@arnoldporter.com)>; Gerstner, Alyssa <[Alyssa.Gerstner@arnoldporter.com](mailto:Alyssa.Gerstner@arnoldporter.com)>; Galin, Ross B. <[rgalin@omm.com](mailto:rgalin@omm.com)>

**Subject:** RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

Hi Andrew -

Following up on this, we expect to have two 30(b)(6) witnesses -- Kim Custer and Vickie Barrow-Klein -- and you've asked for a fact witness deposition of Vickie. Kim is available November 21 or 22 and Vickie is available November 29 or 30. In response to your email about providing multiple dates for each witness, perhaps you can slot in the ones where the dates work on your end and get back to us where you need other dates so we're not canvassing the entire group again. Thanks.

Danny

Danny S. Ashby  
O: +1-972-360-1904  
M: +1-214-577-9886  
[dasbhy@omm.com](mailto:dasbhy@omm.com)

---

**From:** Ashby, Danny S.

**Sent:** Wednesday, October 19, 2022 11:18 AM

**To:** 'Andrew Stephens' <[andrew@hackerstephens.com](mailto:andrew@hackerstephens.com)>; Lollar, Tirzah <[Tirzah.Lollar@arnoldporter.com](mailto:Tirzah.Lollar@arnoldporter.com)>; Raymond Winter <[Raymond.Winter@oag.texas.gov](mailto:Raymond.Winter@oag.texas.gov)>

**Cc:** Amy Hilton <[Amy.Hilton@oag.texas.gov](mailto:Amy.Hilton@oag.texas.gov)>; Heather Hacker <[heather@hackerstephens.com](mailto:heather@hackerstephens.com)>; Margolis, Craig D. <[Craig.Margolis@arnoldporter.com](mailto:Craig.Margolis@arnoldporter.com)>; Odell, Christopher M. <[Christopher.Odell@arnoldporter.com](mailto:Christopher.Odell@arnoldporter.com)>; Godesky, Leah <[lgodesky@omm.com](mailto:lgodesky@omm.com)>; Chapa, Justin R. <[jchapa@omm.com](mailto:jchapa@omm.com)>; Santella, Amanda M. <[asantella@omm.com](mailto:asantella@omm.com)>; Reeder-Ricchetti, Emily <[Emily.Reeder-Ricchetti@arnoldporter.com](mailto:Emily.Reeder-Ricchetti@arnoldporter.com)>; Pieper, Megan <[Megan.Pieper@arnoldporter.com](mailto:Megan.Pieper@arnoldporter.com)>;

Martin, Meghan C. <[Meghan.Martin@arnoldporter.com](mailto:Meghan.Martin@arnoldporter.com)>; Gerstner, Alyssa <[Alyssa.Gerstner@arnoldporter.com](mailto:Alyssa.Gerstner@arnoldporter.com)>; Galin, Ross B. <[rgalin@omm.com](mailto:rgalin@omm.com)>

**Subject:** RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

Hi Andrew -

We're working on the 30(b)(6) witness schedule and will get back to you ASAP on that -- as well as the two additional folks identified below. In the interim, based on the schedules we've confirmed so far, we would propose the following:

Teri Trivisonno - November 15 (Naples, FL)

Tamara Kramer - November 29 (Chicago)

Louis Dudney - December 9 (Chicago)

Louis has no availability on or before November 30, which is why we're proposing December 9. And, of course, we would agree that taking his deposition then would not affect the trial date or any other deadlines in the case.

Thanks.

Danny

Danny S. Ashby  
O: +1-972-360-1904  
M: +1-214-577-9886  
[dashby@omm.com](mailto:dashby@omm.com)

---

**From:** Andrew Stephens <[andrew@hackerstephens.com](mailto:andrew@hackerstephens.com)>

**Sent:** Wednesday, October 19, 2022 11:03 AM

**To:** Lollar, Tirzah <[Tirzah.Lollar@arnoldporter.com](mailto:Tirzah.Lollar@arnoldporter.com)>; Raymond Winter <[Raymond.Winter@oag.texas.gov](mailto:Raymond.Winter@oag.texas.gov)>

**Cc:** Amy Hilton <[Amy.Hilton@oag.texas.gov](mailto:Amy.Hilton@oag.texas.gov)>; Heather Hacker <[heather@hackerstephens.com](mailto:heather@hackerstephens.com)>; Margolis, Craig D. <[Craig.Margolis@arnoldporter.com](mailto:Craig.Margolis@arnoldporter.com)>; Odell, Christopher M. <[Christopher.Odell@arnoldporter.com](mailto:Christopher.Odell@arnoldporter.com)>; Godesky, Leah <[lgodesky@omm.com](mailto:lgodesky@omm.com)>; Ashby, Danny S. <[dashby@omm.com](mailto:dashby@omm.com)>; Chapa, Justin R. <[jchapa@omm.com](mailto:jchapa@omm.com)>; Santella, Amanda M. <[asantella@omm.com](mailto:asantella@omm.com)>; Reeder-Ricchetti, Emily <[Emily.Reeder-Ricchetti@arnoldporter.com](mailto:Emily.Reeder-Ricchetti@arnoldporter.com)>; Pieper, Megan <[Megan.Pieper@arnoldporter.com](mailto:Megan.Pieper@arnoldporter.com)>; Martin, Meghan C. <[Meghan.Martin@arnoldporter.com](mailto:Meghan.Martin@arnoldporter.com)>; Gerstner, Alyssa <[Alyssa.Gerstner@arnoldporter.com](mailto:Alyssa.Gerstner@arnoldporter.com)>

**Subject:** RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

[EXTERNAL MESSAGE]

Tirzah,

Thank you for sending proposed dates. Please let us know proposed dates for the PPFA Affiliate 30(b)(6) depositions so we can see how those will fit into the schedule. As you know, we noticed several of the 30(b)(6) depositions for the last week of November and would like to take those depositions at the end of the discovery period as noticed. Relator is

generally available in November so we have some flexibility there. We also plan to subpoena Marianne DeJong unless you all will be representing her and can accept service.

Danny,

If you could provide proposed dates for the PPFA witnesses and the PPFA 30(b)(6) deposition that would help get the schedule nailed down. We also plan to subpoena Emily Stewart and Rosemary Coluccio unless you all will be representing them and can accept service.

Andrew

**Andrew B. Stephens**

Partner

**HACKERSTEPHENS** LLP

[http://secure-web.cisco.com/1hBce3F6l49Oe\\_vp-yUv1ON03g0XI93BXf9dCCpfAqsl58mDcr09W4q6zxNIGt1y3FPO4d4oTj57tkoeheaYorHjN1rDRKJL463FRnWBkrlNGXmPAXy6WJWP0AvmO1wLpvJ\\_qEdiA-abKrSLyrDFpgmMe9uzPgpkLoOunJTvvlMZvSHZJMPI3fK7a07BqmnqSTNofB-enmc1Ag2GeegWisYtyQwGTNzYQ-qJfXvTFKlm8KY5j-Vgao6ZH9grcJhfXFFXeFSlrVggWlc58-PuyLdWrzdpVqBBtFxTIL48qbrl4WlxAtvIrYrFP4xEX2G\\_XbZfA7AyVh7UDjppw4ox4hQINCod-1lpQKZyxMdpV78FigPg2HyhoGSrX\\_XmpdrpcZKwE4E7N0S3NAdmdac-sKECqIV8lahLWljQCryUcXBEXqAWthc3OKn3KWEc/http%3A%2F%2Fwww.hackerstephens.com](http://secure-web.cisco.com/1hBce3F6l49Oe_vp-yUv1ON03g0XI93BXf9dCCpfAqsl58mDcr09W4q6zxNIGt1y3FPO4d4oTj57tkoeheaYorHjN1rDRKJL463FRnWBkrlNGXmPAXy6WJWP0AvmO1wLpvJ_qEdiA-abKrSLyrDFpgmMe9uzPgpkLoOunJTvvlMZvSHZJMPI3fK7a07BqmnqSTNofB-enmc1Ag2GeegWisYtyQwGTNzYQ-qJfXvTFKlm8KY5j-Vgao6ZH9grcJhfXFFXeFSlrVggWlc58-PuyLdWrzdpVqBBtFxTIL48qbrl4WlxAtvIrYrFP4xEX2G_XbZfA7AyVh7UDjppw4ox4hQINCod-1lpQKZyxMdpV78FigPg2HyhoGSrX_XmpdrpcZKwE4E7N0S3NAdmdac-sKECqIV8lahLWljQCryUcXBEXqAWthc3OKn3KWEc/http%3A%2F%2Fwww.hackerstephens.com)

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**From:** Lollar, Tirzah <[Tirzah.Lollar@arnoldporter.com](mailto:Tirzah.Lollar@arnoldporter.com)>

**Sent:** Tuesday, October 18, 2022 5:55 PM

**To:** Andrew Stephens <[andrew@hackerstephens.com](mailto:andrew@hackerstephens.com)>; Raymond Winter <[Raymond.Winter@oag.texas.gov](mailto:Raymond.Winter@oag.texas.gov)>

**Cc:** Amy Hilton <[Amy.Hilton@oag.texas.gov](mailto:Amy.Hilton@oag.texas.gov)>; Heather Hacker <[heather@hackerstephens.com](mailto:heather@hackerstephens.com)>; Margolis, Craig D.

<[Craig.Margolis@arnoldporter.com](mailto:Craig.Margolis@arnoldporter.com)>; Odell, Christopher M. <[Christopher.Odell@arnoldporter.com](mailto:Christopher.Odell@arnoldporter.com)>;

[lgodesky@omm.com](mailto:lgodesky@omm.com); [dashby@omm.com](mailto:dashby@omm.com); [jchapa@omm.com](mailto:jchapa@omm.com); [asantella@omm.com](mailto:asantella@omm.com); Reeder-Ricchetti, Emily

<[Emily.Reeder-Ricchetti@arnoldporter.com](mailto:Emily.Reeder-Ricchetti@arnoldporter.com)>; Pieper, Megan <[Megan.Pieper@arnoldporter.com](mailto:Megan.Pieper@arnoldporter.com)>; Martin, Meghan C.

<[Meghan.Martin@arnoldporter.com](mailto:Meghan.Martin@arnoldporter.com)>; Gerstner, Alyssa <[Alyssa.Gerstner@arnoldporter.com](mailto:Alyssa.Gerstner@arnoldporter.com)>

**Subject:** RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

Andrew and Ray:

Following up on our call from yesterday and the notices Plaintiffs sent before the parties could discuss scheduling, please let us know if the below dates will work for the depositions you have requested.

Jeffrey Hons - Nov 3 (Austin)

Lou Rossiter - Nov 10 or 17 (Washington, DC)

Ken Lambrecht - Nov 20 (Austin)

David Sokolow - Nov 22 (Austin)

Melaney Linton - Dec 9 (Houston) - Ms. Linton has no availability on or before Nov 30, so we had to propose a date just outside of the Nov 30 close of discovery. We would agree that taking her deposition on Dec 9 would have no impact on the trial date.

We are still working on dates and locations for the Affiliates' 30b6 depositions and will get back to you as soon as possible on them. But I did want to flag that Nov 1 will not work for the PPST 30b6 deposition.

PPFA will respond about their depositions.

Please also let us know if Nov 29 or 30 will work for the deposition of Relator. We assume that this deposition will take place in Austin (exact location to be determined by Defendants), but please confirm that Austin will work.

Thanks,  
Tirzah

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Tirzah Lollar  
Partner | [Bio](#)

**Arnold & Porter**

601 Massachusetts Ave., NW

Washington, DC 20001-3743

T: +1 202.942.6199

[Tirzah.Lollar@arnoldporter.com](mailto:Tirzah.Lollar@arnoldporter.com)

[www.arnoldporter.com](http://www.arnoldporter.com) | [LinkedIn](#) | [Twitter](#)

---

**From:** Andrew Stephens <[andrew@hackerstephens.com](mailto:andrew@hackerstephens.com)>

**Sent:** Thursday, October 13, 2022 7:54 PM

**To:** Lollar, Tirzah <[Tirzah.Lollar@arnoldporter.com](mailto:Tirzah.Lollar@arnoldporter.com)>; Margolis, Craig D. <[Craig.Margolis@arnoldporter.com](mailto:Craig.Margolis@arnoldporter.com)>; Hussain, Murad S. <[Murad.Hussain@arnoldporter.com](mailto:Murad.Hussain@arnoldporter.com)>; Odell, Christopher M. <[Christopher.Odell@arnoldporter.com](mailto:Christopher.Odell@arnoldporter.com)>; [zzz.External.lgodesky@omm.com](mailto:zzz.External.lgodesky@omm.com) <[lgodesky@omm.com](mailto:lgodesky@omm.com)>; [zzz.External.dashby@omm.com](mailto:zzz.External.dashby@omm.com) <[dashby@omm.com](mailto:dashby@omm.com)>; [zzz.External.jchapa@omm.com](mailto:zzz.External.jchapa@omm.com) <[jchapa@omm.com](mailto:jchapa@omm.com)>; [zzz.External.asantella@omm.com](mailto:zzz.External.asantella@omm.com) <[asantella@omm.com](mailto:asantella@omm.com)>

**Cc:** Raymond Winter <[Raymond.Winter@oag.texas.gov](mailto:Raymond.Winter@oag.texas.gov)>; Amy Hilton <[Amy.Hilton@oag.texas.gov](mailto:Amy.Hilton@oag.texas.gov)>; Heather Hacker <[heather@hackerstephens.com](mailto:heather@hackerstephens.com)>

**Subject:** RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

External E-mail

Thanks, Tirzah. Only change in these is the dates.

Andrew

---

**From:** Lollar, Tirzah <[Tirzah.Lollar@arnoldporter.com](mailto:Tirzah.Lollar@arnoldporter.com)>

**Sent:** Thursday, October 13, 2022 6:43 PM

**To:** Andrew Stephens <[andrew@hackerstephens.com](mailto:andrew@hackerstephens.com)>; Margolis, Craig D. <[Craig.Margolis@arnoldporter.com](mailto:Craig.Margolis@arnoldporter.com)>; Hussain, Murad S. <[Murad.Hussain@arnoldporter.com](mailto:Murad.Hussain@arnoldporter.com)>; Odell, Christopher M. <[Christopher.Odell@arnoldporter.com](mailto:Christopher.Odell@arnoldporter.com)>; [lgodesky@omm.com](mailto:lgodesky@omm.com); [dashby@omm.com](mailto:dashby@omm.com); [jchapa@omm.com](mailto:jchapa@omm.com); [asantella@omm.com](mailto:asantella@omm.com)

**Cc:** Raymond Winter <[Raymond.Winter@oag.texas.gov](mailto:Raymond.Winter@oag.texas.gov)>; Amy Hilton <[Amy.Hilton@oag.texas.gov](mailto:Amy.Hilton@oag.texas.gov)>; Heather Hacker <[heather@hackerstephens.com](mailto:heather@hackerstephens.com)>

**Subject:** RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

Andrew, we would like to speak with you about the 30b6 notices on Monday. I'm just checking availability on our side and will revert with a proposed timeframe.

Did anything thing change in these amended notices other than the dates?

Thanks

---

Tirzah Lollar

Partner | [Bio](#)

**Arnold & Porter**

601 Massachusetts Ave., NW

Washington, DC 20001-3743

T: +1 202.942.6199

[Tirzah.Lollar@arnoldporter.com](mailto:Tirzah.Lollar@arnoldporter.com)

[www.arnoldporter.com](http://www.arnoldporter.com) | [LinkedIn](#) | [Twitter](#)

---

**From:** Andrew Stephens <[andrew@hackerstephens.com](mailto:andrew@hackerstephens.com)>

**Sent:** Thursday, October 13, 2022 7:40 PM

**To:** Margolis, Craig D. <[Craig.Margolis@arnoldporter.com](mailto:Craig.Margolis@arnoldporter.com)>; Lollar, Tirzah <[Tirzah.Lollar@arnoldporter.com](mailto:Tirzah.Lollar@arnoldporter.com)>; Hussain, Murad S. <[Murad.Hussain@arnoldporter.com](mailto:Murad.Hussain@arnoldporter.com)>; Odell, Christopher M. <[Christopher.Odell@arnoldporter.com](mailto:Christopher.Odell@arnoldporter.com)>; [zzz.External.lgodesky@omm.com](mailto:zzz.External.lgodesky@omm.com) <[lgodesky@omm.com](mailto:lgodesky@omm.com)>; [zzz.External.dashby@omm.com](mailto:zzz.External.dashby@omm.com) <[dashby@omm.com](mailto:dashby@omm.com)>; [zzz.External.jchapa@omm.com](mailto:zzz.External.jchapa@omm.com) <[jchapa@omm.com](mailto:jchapa@omm.com)>; [zzz.External.asantella@omm.com](mailto:zzz.External.asantella@omm.com) <[asantella@omm.com](mailto:asantella@omm.com)>

**Cc:** Raymond Winter <[Raymond.Winter@oag.texas.gov](mailto:Raymond.Winter@oag.texas.gov)>; Amy Hilton <[Amy.Hilton@oag.texas.gov](mailto:Amy.Hilton@oag.texas.gov)>; Heather Hacker <[heather@hackerstephens.com](mailto:heather@hackerstephens.com)>

**Subject:** RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

External E-mail

Counsel:

Attached are Amended Notices of 30(b)(6) Depositions of PPFA, PPGT and PPGC. If you would like to discuss the dates or locations of these depositions, or the other depositions we have noticed, please let us know and we can schedule a call. Relator and the State are available anytime on Monday (10/17), Wednesday morning (10/19), or Thursday morning (10/20).

Best regards,

Andrew

---

**From:** Andrew Stephens

**Sent:** Tuesday, October 11, 2022 8:04 PM

**To:** Margolis, Craig D. <[Craig.Margolis@arnoldporter.com](mailto:Craig.Margolis@arnoldporter.com)>; Lollar, Tirzah <[Tirzah.Lollar@arnoldporter.com](mailto:Tirzah.Lollar@arnoldporter.com)>; Hussain, Murad S. <[Murad.Hussain@arnoldporter.com](mailto:Murad.Hussain@arnoldporter.com)>; Odell, Christopher M. <[Christopher.Odell@arnoldporter.com](mailto:Christopher.Odell@arnoldporter.com)>; [lgodesky@omm.com](mailto:lgodesky@omm.com); [dashby@omm.com](mailto:dashby@omm.com); [jchapa@omm.com](mailto:jchapa@omm.com); [asantella@omm.com](mailto:asantella@omm.com)

**Cc:** Raymond Winter <[Raymond.Winter@oag.texas.gov](mailto:Raymond.Winter@oag.texas.gov)>; Amy Hilton <[Amy.Hilton@oag.texas.gov](mailto:Amy.Hilton@oag.texas.gov)>; Heather Hacker <[heather@hackerstephens.com](mailto:heather@hackerstephens.com)>

**Subject:** RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

Please see attached deposition notices. If you would like to discuss dates and locations please let us know and we can set up a call.

Andrew

**Andrew B. Stephens**

Partner

**HACKERSTEPHENS** LLP

[http://secure-web.cisco.com/1hBce3F6l49Oe\\_vp-yUv1ON03g0XI93BXf9dCCpfAqsl58mDcr09W4q6zxNIGt1y3FPO4d4oTj57tkoeheaYorHjN1rDRKJLL463FRnWBkrlINGXmPAXy6WJWP0AvmO1wLpvJ\\_qEdiA-abKrSLyrDFpgmMe9uzPgpkLoOunJTvvIMZvSHZJMPI3fK7a07BqmngSTNofB-enmc1Ag2GeegWisYtyQwGTNzYQ-qJfXvTFKIm8KY5j-Vgao6ZH9grcJhfXFFXeFSlrVggWLC58-PuyLdWrzdpVgBBtFxTIL48qbrl4WlxAtvIrYlrFP4xEX2G\\_XbZfA7AyVh7UDjppw4ox4hQINCod-1lpQKZyxMdpV78FigPg2HyhoGSrX\\_XmpdrpcZKwE4E7N0S3NAdmdac-sKECqIV8lahLWljQCryUcXBEXqAWthc3OKn3KWEc/http%3A%2F%2Fwww.hackerstephens.com](http://secure-web.cisco.com/1hBce3F6l49Oe_vp-yUv1ON03g0XI93BXf9dCCpfAqsl58mDcr09W4q6zxNIGt1y3FPO4d4oTj57tkoeheaYorHjN1rDRKJLL463FRnWBkrlINGXmPAXy6WJWP0AvmO1wLpvJ_qEdiA-abKrSLyrDFpgmMe9uzPgpkLoOunJTvvIMZvSHZJMPI3fK7a07BqmngSTNofB-enmc1Ag2GeegWisYtyQwGTNzYQ-qJfXvTFKIm8KY5j-Vgao6ZH9grcJhfXFFXeFSlrVggWLC58-PuyLdWrzdpVgBBtFxTIL48qbrl4WlxAtvIrYlrFP4xEX2G_XbZfA7AyVh7UDjppw4ox4hQINCod-1lpQKZyxMdpV78FigPg2HyhoGSrX_XmpdrpcZKwE4E7N0S3NAdmdac-sKECqIV8lahLWljQCryUcXBEXqAWthc3OKn3KWEc/http%3A%2F%2Fwww.hackerstephens.com)

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**From:** Andrew Stephens

**Sent:** Thursday, September 1, 2022 12:07 PM

**To:** Margolis, Craig D. <[Craig.Margolis@arnoldporter.com](mailto:Craig.Margolis@arnoldporter.com)>; Lollar, Tirzah <[Tirzah.Lollar@arnoldporter.com](mailto:Tirzah.Lollar@arnoldporter.com)>; Hussain, Murad S. <[Murad.Hussain@arnoldporter.com](mailto:Murad.Hussain@arnoldporter.com)>; Odell, Christopher M. <[Christopher.Odell@arnoldporter.com](mailto:Christopher.Odell@arnoldporter.com)>; [lgodesky@omm.com](mailto:lgodesky@omm.com); [dashby@omm.com](mailto:dashby@omm.com); [jchapa@omm.com](mailto:jchapa@omm.com); [asantella@omm.com](mailto:asantella@omm.com)

**Cc:** Raymond Winter <[Raymond.Winter@oag.texas.gov](mailto:Raymond.Winter@oag.texas.gov)>; Amy Hilton <[Amy.Hilton@oag.texas.gov](mailto:Amy.Hilton@oag.texas.gov)>; Heather Hacker <[heather@hackerstephens.com](mailto:heather@hackerstephens.com)>

**Subject:** RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

Attached are Relator's Sixth Requests for Production to PPFA and the PPFA Affiliates.

Andrew

**Andrew B. Stephens**

Partner

**HACKERSTEPHENS** LLP

[http://secure-web.cisco.com/1hBce3F6l49Oe\\_vp-yUv1ON03g0XI93BXf9dCCpfAqsl58mDcr09W4q6zxNIGt1y3FPO4d4oTj57tkoeheaYorHjN1rDRKJLL463FRnWBkrlINGXmPAXy6WJWP0AvmO1wLpvJ\\_qEdiA-abKrSLyrDFpgmMe9uzPgpkLoOunJTvvIMZvSHZJMPI3fK7a07BqmngSTNofB-enmc1Ag2GeegWisYtyQwGTNzYQ-qJfXvTFKIm8KY5j-Vgao6ZH9grcJhfXFFXeFSlrVggWLC58-PuyLdWrzdpVgBBtFxTIL48qbrl4WlxAtvIrYlrFP4xEX2G\\_XbZfA7AyVh7UDjppw4ox4hQINCod-1lpQKZyxMdpV78FigPg2HyhoGSrX\\_XmpdrpcZKwE4E7N0S3NAdmdac-sKECqIV8lahLWljQCryUcXBEXqAWthc3OKn3KWEc/http%3A%2F%2Fwww.hackerstephens.com](http://secure-web.cisco.com/1hBce3F6l49Oe_vp-yUv1ON03g0XI93BXf9dCCpfAqsl58mDcr09W4q6zxNIGt1y3FPO4d4oTj57tkoeheaYorHjN1rDRKJLL463FRnWBkrlINGXmPAXy6WJWP0AvmO1wLpvJ_qEdiA-abKrSLyrDFpgmMe9uzPgpkLoOunJTvvIMZvSHZJMPI3fK7a07BqmngSTNofB-enmc1Ag2GeegWisYtyQwGTNzYQ-qJfXvTFKIm8KY5j-Vgao6ZH9grcJhfXFFXeFSlrVggWLC58-PuyLdWrzdpVgBBtFxTIL48qbrl4WlxAtvIrYlrFP4xEX2G_XbZfA7AyVh7UDjppw4ox4hQINCod-1lpQKZyxMdpV78FigPg2HyhoGSrX_XmpdrpcZKwE4E7N0S3NAdmdac-sKECqIV8lahLWljQCryUcXBEXqAWthc3OKn3KWEc/http%3A%2F%2Fwww.hackerstephens.com)

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---

**From:** Andrew Stephens

**Sent:** Wednesday, August 31, 2022 10:30 PM

**To:** Margolis, Craig D. <[Craig.Margolis@arnoldporter.com](mailto:Craig.Margolis@arnoldporter.com)>; Lollar, Tirzah <[Tirzah.Lollar@arnoldporter.com](mailto:Tirzah.Lollar@arnoldporter.com)>; Hussain,



Murad S. <[Murad.Hussain@arnoldporter.com](mailto:Murad.Hussain@arnoldporter.com)>; Odell, Christopher M. <[Christopher.Odell@arnoldporter.com](mailto:Christopher.Odell@arnoldporter.com)>;  
[lgodesky@omm.com](mailto:lgodesky@omm.com); [dashby@omm.com](mailto:dashby@omm.com); [jchapa@omm.com](mailto:jchapa@omm.com); [asantella@omm.com](mailto:asantella@omm.com)  
**Cc:** Raymond Winter <[Raymond.Winter@oag.texas.gov](mailto:Raymond.Winter@oag.texas.gov)>; Amy Hilton <[Amy.Hilton@oag.texas.gov](mailto:Amy.Hilton@oag.texas.gov)>; Heather Hacker  
<[heather@hackerstephens.com](mailto:heather@hackerstephens.com)>  
**Subject:** RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

Attached are Relator's Fifth Requests for Production to the PPFA Affiliates.

Andrew

**Andrew B. Stephens**  
Partner

**HACKERSTEPHENS** LLP

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---

**From:** Andrew Stephens  
**Sent:** Tuesday, August 23, 2022 11:13 AM  
**To:** Margolis, Craig D. <[Craig.Margolis@arnoldporter.com](mailto:Craig.Margolis@arnoldporter.com)>; Lollar, Tirzah <[Tirzah.Lollar@arnoldporter.com](mailto:Tirzah.Lollar@arnoldporter.com)>; Hussain, Murad S. <[Murad.Hussain@arnoldporter.com](mailto:Murad.Hussain@arnoldporter.com)>; Odell, Christopher M. <[Christopher.Odell@arnoldporter.com](mailto:Christopher.Odell@arnoldporter.com)>;  
[lgodesky@omm.com](mailto:lgodesky@omm.com); [dashby@omm.com](mailto:dashby@omm.com); [jchapa@omm.com](mailto:jchapa@omm.com); [asantella@omm.com](mailto:asantella@omm.com)  
**Cc:** Raymond Winter <[Raymond.Winter@oag.texas.gov](mailto:Raymond.Winter@oag.texas.gov)>; Amy Hilton <[Amy.Hilton@oag.texas.gov](mailto:Amy.Hilton@oag.texas.gov)>; Heather Hacker  
<[heather@hackerstephens.com](mailto:heather@hackerstephens.com)>  
**Subject:** RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

Attached are Relator's Fourth Requests for Production to the PPFA Affiliates.

Andrew

**Andrew B. Stephens**  
Partner

**HACKERSTEPHENS** LLP

[http://secure-web.cisco.com/1hBce3F6I49Oe\\_vp-yUv1ON03g0XI93BXf9dCCpfAqsl58mDcr09W4q6zxNIGt1y3FPO4d4oTj57tkoeheaYorHjN1rDRKJL463FRnWBkrlNGXmPAXy6WJWP0AvM01wLpvJ\\_qEdiA-abKrSLyrDFpgmMe9uzPgpkLoOunJTvvIMZvSHZJMPI3fK7a07BqmngSTNofB-enmc1Ag2GeegWisYtyQwGTNzYQ-qJfXvTFKIm8KY5j-Vgaa06ZH9grcJhfXFFXeFSlrVggWLC58-PuyLdWrzdpVgBBtFxTIL48qbrl4WlxAtvIrYrFP4xEX2G\\_XbZfA7AyVh7UDjppw4ox4hQINCod-1lpQKZyxMdpV78FigPg2HyhoGSrX\\_XmpdrpcZKwE4E7N0S3NAdmdac-sKECqIV8lahLWljQCryUcXBEXqAWthc3OKn3KWEc/http%3A%2F%2Fwww.hackerstephens.com](http://secure-web.cisco.com/1hBce3F6I49Oe_vp-yUv1ON03g0XI93BXf9dCCpfAqsl58mDcr09W4q6zxNIGt1y3FPO4d4oTj57tkoeheaYorHjN1rDRKJL463FRnWBkrlNGXmPAXy6WJWP0AvM01wLpvJ_qEdiA-abKrSLyrDFpgmMe9uzPgpkLoOunJTvvIMZvSHZJMPI3fK7a07BqmngSTNofB-enmc1Ag2GeegWisYtyQwGTNzYQ-qJfXvTFKIm8KY5j-Vgaa06ZH9grcJhfXFFXeFSlrVggWLC58-PuyLdWrzdpVgBBtFxTIL48qbrl4WlxAtvIrYrFP4xEX2G_XbZfA7AyVh7UDjppw4ox4hQINCod-1lpQKZyxMdpV78FigPg2HyhoGSrX_XmpdrpcZKwE4E7N0S3NAdmdac-sKECqIV8lahLWljQCryUcXBEXqAWthc3OKn3KWEc/http%3A%2F%2Fwww.hackerstephens.com)

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---

**From:** Andrew Stephens

**Sent:** Wednesday, August 3, 2022 4:18 PM

**To:** Margolis, Craig D. <[Craig.Margolis@arnoldporter.com](mailto:Craig.Margolis@arnoldporter.com)>; Lollar, Tirzah <[Tirzah.Lollar@arnoldporter.com](mailto:Tirzah.Lollar@arnoldporter.com)>; Hussain, Murad S. <[Murad.Hussain@arnoldporter.com](mailto:Murad.Hussain@arnoldporter.com)>; Odell, Christopher M. <[Christopher.Odell@arnoldporter.com](mailto:Christopher.Odell@arnoldporter.com)>; [lgodesky@omm.com](mailto:lgodesky@omm.com); [dashby@omm.com](mailto:dashby@omm.com); [jchapa@omm.com](mailto:jchapa@omm.com); [asantella@omm.com](mailto:asantella@omm.com)

**Cc:** Raymond Winter <[Raymond.Winter@oag.texas.gov](mailto:Raymond.Winter@oag.texas.gov)>; Amy Hilton <[Amy.Hilton@oag.texas.gov](mailto:Amy.Hilton@oag.texas.gov)>; Heather Hacker <[heather@hackerstephens.com](mailto:heather@hackerstephens.com)>

**Subject:** RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

Attached are Relator's Fifth Requests for Production to Defendant Planned Parenthood Federation of America, Inc.

Andrew

**Andrew B. Stephens**

Partner

**HACKERSTEPHENS** LLP

[http://secure-web.cisco.com/1hBce3F6l49Oe\\_vp-yUv1ON03g0XI93BXF9dCCpfAqsl58mDcr09W4q6zxNIGt1y3FPO4d4oTj57tkoeheaYorHjN1rDRKJL463FRnWBkrlINGXmPAXy6WJW-P0AvmO1wLpvJ\\_qEdiA-abKrSLyrDFpgrmMe9uzPgpkLoOunJTvvIMZvSHZJMPI3fK7a07BqmngSTNofB-enmc1Ag2GeegWisYtyQwGTNzYQ-qJfXvTFKIm8KY5j-Vgaa06ZH9grcJhfXFFXeFSrVggWLC58-PuyLdWrzdpVgBBtFxTIL48qbrl4WlxAtvIrYlrfP4xEX2G\\_XbZfA7AyVh7UDjppw4ox4hQINCod-1lpQKZyxMdpV78FigPg2HyhoGSrX\\_XmpdrpcZKwE4E7N0S3NAdmdac-sKECqIV8lahLWlJCryUcXBEXqAWthc3OKn3KWEc/http%3A%2F%2Fwww.hackerstephens.com](http://secure-web.cisco.com/1hBce3F6l49Oe_vp-yUv1ON03g0XI93BXF9dCCpfAqsl58mDcr09W4q6zxNIGt1y3FPO4d4oTj57tkoeheaYorHjN1rDRKJL463FRnWBkrlINGXmPAXy6WJW-P0AvmO1wLpvJ_qEdiA-abKrSLyrDFpgrmMe9uzPgpkLoOunJTvvIMZvSHZJMPI3fK7a07BqmngSTNofB-enmc1Ag2GeegWisYtyQwGTNzYQ-qJfXvTFKIm8KY5j-Vgaa06ZH9grcJhfXFFXeFSrVggWLC58-PuyLdWrzdpVgBBtFxTIL48qbrl4WlxAtvIrYlrfP4xEX2G_XbZfA7AyVh7UDjppw4ox4hQINCod-1lpQKZyxMdpV78FigPg2HyhoGSrX_XmpdrpcZKwE4E7N0S3NAdmdac-sKECqIV8lahLWlJCryUcXBEXqAWthc3OKn3KWEc/http%3A%2F%2Fwww.hackerstephens.com)

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**From:** Andrew Stephens

**Sent:** Thursday, July 7, 2022 12:16 PM

**To:** Margolis, Craig D. <[Craig.Margolis@arnoldporter.com](mailto:Craig.Margolis@arnoldporter.com)>; Lollar, Tirzah <[Tirzah.Lollar@arnoldporter.com](mailto:Tirzah.Lollar@arnoldporter.com)>; Hussain, Murad S. <[Murad.Hussain@arnoldporter.com](mailto:Murad.Hussain@arnoldporter.com)>; Odell, Christopher M. <[Christopher.Odell@arnoldporter.com](mailto:Christopher.Odell@arnoldporter.com)>; [lgodesky@omm.com](mailto:lgodesky@omm.com); [dashby@omm.com](mailto:dashby@omm.com); [jchapa@omm.com](mailto:jchapa@omm.com); [asantella@omm.com](mailto:asantella@omm.com)

**Cc:** Raymond Winter <[Raymond.Winter@oag.texas.gov](mailto:Raymond.Winter@oag.texas.gov)>; Amy Hilton <[Amy.Hilton@oag.texas.gov](mailto:Amy.Hilton@oag.texas.gov)>; Heather Hacker <[heather@hackerstephens.com](mailto:heather@hackerstephens.com)>

**Subject:** RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

Attached are Relator's Fourth Requests for Production to Defendant Planned Parenthood Federation of America, Inc., and Relator's Third Requests for Production to Defendants Planned Parenthood Gulf Coast, Inc., Planned Parenthood Greater Texas, Inc., Planned Parenthood South Texas, Inc., Planned Parenthood Cameron County, Inc., and Planned Parenthood San Antonio, Inc.

Andrew

**Andrew B. Stephens**

Partner

**HACKERSTEPHENS** LLP

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**From:** Andrew Stephens

**Sent:** Thursday, June 16, 2022 4:12 PM

**To:** Margolis, Craig D. <[Craig.Margolis@arnoldporter.com](mailto:Craig.Margolis@arnoldporter.com)>; Lollar, Tirzah <[Tirzah.Lollar@arnoldporter.com](mailto:Tirzah.Lollar@arnoldporter.com)>; Hussain, Murad S. <[Murad.Hussain@arnoldporter.com](mailto:Murad.Hussain@arnoldporter.com)>; Odell, Christopher M. <[Christopher.Odell@arnoldporter.com](mailto:Christopher.Odell@arnoldporter.com)>; [lgodesky@omm.com](mailto:lgodesky@omm.com); [dashby@omm.com](mailto:dashby@omm.com); [jchapa@omm.com](mailto:jchapa@omm.com); [asantella@omm.com](mailto:asantella@omm.com)

**Cc:** Raymond Winter <[Raymond.Winter@oag.texas.gov](mailto:Raymond.Winter@oag.texas.gov)>; Amy Hilton <[Amy.Hilton@oag.texas.gov](mailto:Amy.Hilton@oag.texas.gov)>; Heather Hacker <[heather@hackerstephens.com](mailto:heather@hackerstephens.com)>

**Subject:** RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

Attached are Relator's Third Requests for Production to Defendant Planned Parenthood Federation of America, Inc., and Relator's Second Requests for Production to Defendants Planned Parenthood Gulf Coast, Inc., Planned Parenthood Greater Texas, Inc., Planned Parenthood South Texas, Inc., Planned Parenthood Cameron County, Inc., and Planned Parenthood San Antonio, Inc.

Andrew

**Andrew B. Stephens**

Partner

**HACKERSTEPHENS** LLP

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**From:** Andrew Stephens

**Sent:** Thursday, June 2, 2022 10:54 PM

**To:** Margolis, Craig D. <[Craig.Margolis@arnoldporter.com](mailto:Craig.Margolis@arnoldporter.com)>; Lollar, Tirzah <[Tirzah.Lollar@arnoldporter.com](mailto:Tirzah.Lollar@arnoldporter.com)>; Hussain,

Murad S. <[Murad.Hussain@arnoldporter.com](mailto:Murad.Hussain@arnoldporter.com)>; Odell, Christopher M. <[Christopher.Odell@arnoldporter.com](mailto:Christopher.Odell@arnoldporter.com)>; [lgodesky@omm.com](mailto:lgodesky@omm.com); [dashby@omm.com](mailto:dashby@omm.com); [jchapa@omm.com](mailto:jchapa@omm.com); [asantella@omm.com](mailto:asantella@omm.com)  
Cc: Raymond Winter <[Raymond.Winter@oag.texas.gov](mailto:Raymond.Winter@oag.texas.gov)>; Amy Hilton <[Amy.Hilton@oag.texas.gov](mailto:Amy.Hilton@oag.texas.gov)>; Heather Hacker <[heather@hackerstephens.com](mailto:heather@hackerstephens.com)>  
Subject: RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

Attached are Relator's Second Requests for Production to Defendant Planned Parenthood Federation of America, Inc.

Andrew

**Andrew B. Stephens**  
Partner

**HACKERSTEPHENS** LLP

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**From:** Andrew Stephens  
**Sent:** Friday, May 27, 2022 11:51 PM  
**To:** Margolis, Craig D. <[Craig.Margolis@arnoldporter.com](mailto:Craig.Margolis@arnoldporter.com)>; Lollar, Tirzah <[Tirzah.Lollar@arnoldporter.com](mailto:Tirzah.Lollar@arnoldporter.com)>; Hussain, Murad S. <[Murad.Hussain@arnoldporter.com](mailto:Murad.Hussain@arnoldporter.com)>; Odell, Christopher M. <[Christopher.Odell@arnoldporter.com](mailto:Christopher.Odell@arnoldporter.com)>  
**Cc:** Raymond Winter <[Raymond.Winter@oag.texas.gov](mailto:Raymond.Winter@oag.texas.gov)>; Amy Hilton <[Amy.Hilton@oag.texas.gov](mailto:Amy.Hilton@oag.texas.gov)>; Heather Hacker <[heather@hackerstephens.com](mailto:heather@hackerstephens.com)>  
**Subject:** United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

Attached are Relator's First Interrogatories and Requests for Production to Defendants.

Andrew

**Andrew B. Stephens**  
Partner

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